

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	Chapter 11
In re	:	
	:	Case No. 08-13555 (JMP)
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	
	:	Jointly Administered
Debtors.	:	
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DECLARATION OF MARC DE LEEUW

Marc De Leeuw hereby declares as follows:

1. I am a member of the Bar of this Court and of Sullivan & Cromwell LLP, counsel in the above-captioned action for Claimants Canary Wharf Management Limited, Heron Quays (HQ2) T1 Limited and Heron Quays (HQ2) T2 Limited (collectively, "Canary Wharf"). I submit this declaration to provide the Court with certain documents cited in the Response of Canary Wharf to the Objection to Proofs of Claim Numbers 14824 and 14826.
2. Attached hereto as Exhibit 1 are excerpts (cover pages and pages 2 and 32 of Ex. 99.1 thereto) of the Form 8-K filed by Lehman Brothers Holdings Inc. ("LBHI") with the Securities and Exchange Commission ("SEC") on April 16, 2010.
3. Attached hereto as Exhibit 2 are excerpts (cover pages, page 2 and Exhibit 99.2) of the Form 8-K filed by LBHI with the SEC on September 19, 2008.
4. Attached hereto as Exhibit 3 are excerpts (cover page and pages 1, 6, 8-11, 44, 55, and 61) of the Canary Wharf Group plc Annual Report for the year ended December 31, 2011, filed with Companies House (the regulator in the United Kingdom with which certain companies must file financial statements) on April 27, 2012.

5. Attached hereto as Exhibit 4 is a copy of the Agreement for Lease between LBHI, Lehman Brothers Limited (“LBL”), Heron Quays Properties Limited, and Canary Wharf Group plc, dated March 30, 2001.

6. Attached hereto as Exhibit 5 are excerpts (cover page and pages 4 and 70) of an Admission Document for Songbird Estates plc, published pursuant to the Rules of the Alternative Investment Market (a submarket of the London Stock Exchange, based in London, England), on April 23, 2004.

7. Attached hereto as Exhibit 6 is a copy of a lease between Heron Quays (HQ2) T1 Limited, Heron Quays (HQ2) T2 Limited, Canary Wharf Management Limited, Canary Wharf Holdings Limited, LBL, and LBHI, dated March 16, 2005.

8. Attached hereto as Exhibit 7 are excerpts (cover pages, table of contents and page 92 of Exhibit 13.01 thereto) of LBHI’s Form 10-K for its fiscal year ended November 30, 2003, filed with the SEC on February 26, 2004.

9. Attached hereto as Exhibit 8 are excerpts (cover pages, table of contents and page 111) of LBHI’s Form 10-K for its fiscal year ended November 30, 2004, filed with the SEC on February 14, 2005.

10. Attached hereto as Exhibit 9 are excerpts (cover pages, table of contents and page 98) of LBHI’s Form 10-K for its fiscal year ended November 30, 2005, filed with the SEC on February 13, 2006.

11. Attached hereto as Exhibit 10 are excerpts (cover pages, table of contents and page 105) of LBHI’s Form 10-K for its fiscal year ended November 30, 2006, filed with the SEC on February 13, 2007.

12. Attached hereto as Exhibit 11 are excerpts (cover pages, table of contents and page 122) of LBHI's Form 10-K for its fiscal year ended November 30, 2007, filed with the SEC on January 29, 2008.

13. Attached hereto as Exhibit 12 is a copy of this Court's Order Confirming Modified Third Amended Joint Chapter 11 Plan of LBHI in *In re Lehman Brothers Holdings Inc., et al.*, No. 13555-2008 (JMP) (Bankr. S.D.N.Y. December 6, 2011).

14. Attached hereto as Exhibit 13 are excerpts (cover pages, table of contents and pages 3-7 and 22) of the Joint Administrators' Progress Report on LBL in Administration in the United Kingdom (providing details of the work undertaken and the progress made by the LBL Administrators during the six-month period ending March 14, 2009), dated April 14, 2009.

15. Attached hereto as Exhibit 14 is a copy of a proof of claim filed in this action by Heron Quays (HQ2) T1 Limited and Heron Quays (HQ2) T2 Limited, dated September 17, 2009.

16. Attached hereto as Exhibit 15 is a copy of a proof of claim filed in this action by Canary Wharf Management Limited, dated September 17, 2009.

17. Attached hereto as Exhibit 16 are copies of two Guarantee Claim Summaries submitted to LBHI (one by Canary Wharf Management Limited, and the other by Heron Quays (HQ2) T1 Limited and Heron Quays (HQ2) T2 Limited), dated October 16, 2009.

18. Attached hereto as Exhibit 17 are excerpts (cover page, table of contents and pages 1, 4, and 14) of the Joint Administrators' Progress Report on LBL in Administration in the United Kingdom (providing details of the work undertaken and the progress made by the LBL Administrators during the six-month period ending March 14, 2010), dated April 13, 2010.

19. Attached hereto as Exhibit 18 is a copy of a letter from Dan Roberts of CB Richard Ellis to Richard Archer of Canary Wharf Group plc, dated October 13, 2010.

20. Attached hereto as Exhibit 19 is a copy of a letter agreement by and among Heron Quays (HQ2) T1 Limited, Heron Quays (HQ2) T2 Limited, Canary Wharf Group plc, Canary Wharf Contractors Limited, Canary Wharf (Car Parks) Limited, Heron Quays (RT3) T1 Limited, Heron Quays (RT3) T2 Limited, Heron Quays Properties Limited, Canary Wharf Management Limited, Lehman Brothers Lease and Finance (No 1) Limited (in administration), LBL (in administration), and the Administrators of LBL, dated December 3, 2010.

21. Attached hereto as Exhibit 20 is a copy of certain emails between Andrew Dietderich of the firm of Sullivan & Cromwell LLP and Richard Krasnow of the firm of Weil, Gotshal & Manges LLP, dated December 8-10, 2010.

22. Attached hereto as Exhibit 21 are excerpts (cover page, table of contents and pages 1-2, 5, 9, 11, 14-15, 48-50, 62, 102-103) of a lease between HQCB Investments Limited, JPMorgan Chase Bank, N.A., Heron Quays Properties Limited, Canary Wharf Management Limited, Canary Wharf Investments Limited, and Canary Wharf Limited, dated December 20, 2010.

23. Attached hereto as Exhibit 22 are excerpts (cover page, table of contents and pages 1-7) of an Agreement Relating to the Sale of a Lease, between Heron Quays (HQ2) T1 Limited and Heron Quays (HQS) T2 Limited, Morgan Property Development Company Limited, Canary Wharf Holdings Limited, and HQCB Properties (HQ2) Limited, dated December 20, 2010.

24. Attached hereto as Exhibit 23 is a copy of a Stipulation, Agreement and Order Regarding Certain Claims Filed by the Canary Wharf Entities, entered by this Court in *In re Lehman Brothers Holdings Inc., et al.*, No. 13555-2008 (JMP) (Bankr. S.D.N.Y.), on September 1, 2011.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on October 12, 2012.

/s/ Marc De Leeuw
Marc De Leeuw